

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
RANDALL SCOTT MCKILLOP	:	
LISA MARIE MCKILLOP	:	CASE NO. 1:17-bk-00749
Debtors		
	:	
FIRST NATIONAL BANK OF	:	
PENNSYLVANIA : SUCCESSOR BY	:	
MERGER TO METRO BANK,	:	
Movant		
	:	
RANDALL SCOTT MCKILLOP	:	
LISA MARIE MCKILLOP	:	
Respondents		
	:	
	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted that Movant is a creditor; however, this paragraph paraphrases of a portion of a document, which speaks for itself; to the extent that this paraphrase conflicts with the actual wording or meaning of the document, it is denied.
5. Admitted that Movant is a creditor; however, this paragraph paraphrases of a portion of a document, which speaks for itself; to the extent that this paraphrase conflicts with the actual wording or meaning of the document, it is denied.
6. Admitted.
7. Admitted that the debtors fell behind; however, they intend to cure the two months of arrearages within a reasonable time.
8. Denied. The plan was modified on January 2, 2018 and the plan payment is \$305.00 per month.
9. Denied. The debtors intend to cure the two months of arrearages within a reasonable time.
10. Denied. The debtors intend to cure the two months of arrearages within a reasonable time.

11. Denied. Movant lacks cause for relief. The debtors intend to cure the two months of arrearages within a reasonable time.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron
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